

UNITED STATES DISTRICT COURT
— DISTRICT of MAINE

RECEPTION AND MEDICAL CENTER

DATE

INMATE INITIALS

JOHN JAY CANNON,
Plaintiff,

Civil No.
16-372-JAW

vs
Romey Boufford, et al.,
Defendants.

— Declaration in Support of
Motion for Appointment of Counsel —

JOHN JAY CANNON STATED:

(1) I AM THE PLAINTIFF IN THE ABOVE
TITLED CASE AND I MAKE THIS DECLARATION
IN SUPPORT of my motion for LEAD COUNSEL.

(2) THE COMPLAINT IN THIS CASE ALLEGES
THE DEFENDANTS:

(a) VIOLATES A NUMBER of PLAINTIFF
CANNON'S U.S. CONSTITUTIONAL RIGHTS BETTER
EXPLAINED AND CLARIFIED IN PRO SE CANNON'S
November 21ST 2016, "OPPOSITION TO (DE-
FENDANTS) MOTION TO DISMISS." THESE VIOLA-
TIONS, INCLUSIVE of THE FALSE STATEMENTS
REGARDING CANNON'S BEHAVIOR DIRECTED TO
THE CLASSIFICATION COMMITTEE of THE FLORIDA
DEPARTMENT of CORRECTIONS, RESULTED IN
CANNON'S SEGREGATION for 673 DAYS IN
VARIOUS HIGH SECURITY TEN FOOT BY SIX
FOOT PRISON CELLS UNDER DISCIPLINARY SEGRE-
GATION CONDITIONS;

(b) ACTED IN EXCESS of STATUTORY

Authority while ignoring their own policy statements covering the administrative segregation of Maine State Prison inmates;

(c) Made conclusions of Condon's guilt (to an allegation Condon was still under "investigation" for) to the F.D.O.C. based upon unlawful procedure;

(d) Were affected by bias against Condon in that they treated him radically different than other Maine State prisoners similarly situated; and

(e) Acted arbitrarily, capriciously and with an abuse of discretion towards Plaintiff Condon while maintaining an "air" of concealed unconcern regarding Condon's constitutional rights.

(3) This case will require discovery of documents and possible depositions of several witnesses.

(4) Condon has demanded a trial by jury in this action has taken.

(5) Plaintiff has no legal training.

(6) Plaintiff has scant ability and resources, aside from the documents he managed to salvage, to investigate the facts here in that he was forcibly transferred over 1000 miles from Maine.

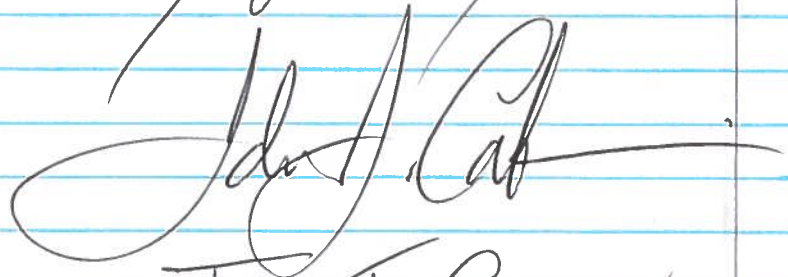
(7) As set forth in the Memorandum of Law accompanying this motion and other documents Plaintiff Condon has filed with this Honorable Court to date,

THESE FACTS, PRESENTED IN ALLIANCE WITH
THE LEGAL MERIT OF PLAINTIFF'S CLAIMS,
SUPPORT THE APPOINTMENT OF COUNSEL
TO ASSIST COMMAN IN PRESENTING HIS
CASE.

Wherefore, Plaintiff Respectfully
PLEADS THAT HIS MOTION BE GRANTED.

Pursuant to 28 U.S.C. Section
1746, I declare under the penalty of
perjury that the foregoing is true and
correct.

Signed This 7th Day of FEBRUARY, 2017.



JOHN J. COMMAN
#148840
RMC WEST UNIT
PO BOX 628
LAKE BUTLER, FLA 32054